

From: [Michael PINTO](#)
To: [Bury, Carolyn](#)
Cc: [Bob WRIGHT](#)
Subject: Bi-Monthly Progress Report
Date: Friday, May 09, 2014 3:33:40 PM
Attachments: [removed.txt](#)
[March April 2014.pdf](#)

Attached is the March/April 2014 Bi-Monthly Progress Report for the Arkema East Plant.

Michael Pinto
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Attachment name: [image001.jpg]
Attachment type: [image/jpeg]



May 9, 2014

via electronic mail

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch (HRE-8J)
77 Jackson Street
Chicago, IL 60604
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order
Docket No. V-W-89R-45
Arkema Inc.
Riverview, Michigan
MID 005 363114
Progress Report #145

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of March and April 2014. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for May and June 2014 is also included.

I. East Plant Activities Completed in March and April

CMS Task IV

The CMS is currently under review by USEPA.

LSS continues to cooperate with GLNPO and other non-federal parties to complete a design for a Great Lakes Legacy Act remediation project in the Trenton Channel.

Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,234,860 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 18,510 gallons of groundwater were extracted and treated during the reporting period. The volume of water treated was lower than typical for a two month period due to the system being down for pump timer procurement and replacement.

The first quarter Area 17 groundwater monitoring report was submitted to EPA.

The Area 17 containment wall was inspected in response to a leak in a sheet pile wall observed during 2013 Trenton Channel sampling in the vicinity of the East Plant. No leak was detected and it was concluded that the leak observed by GLNPO was not in the Area 17 containment wall and was likely in the similar looking sheet pile wall to the south, which is not part of the Area 17 containment system.

Other Activities

The first quarter groundwater monitoring was performed in Area 17 (Halowax Area) in accordance with the EPA approved work plan.

II. Corrective Action Activities Anticipated for May and June 2014

CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Second quarter Area 17 groundwater monitoring will be performed.

Other Activities

Work will continue on the GLLA Trenton Channel project.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto
Principal Environmental Engineer
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing
Mr. Laura Verona- MDNR - Waste Management Div. Livonia